

MMI HOTEL GROUP



1817 Crane Ridge Drive
Jackson, Mississippi 39216

P.O. Box 16807
Jackson, Mississippi 39236-6807

Phone Number: 601/982-7713
FAX Number: 601/362-7961

DO NOT TELETYPE ORIGINAL

RECEIVED

JUL 27 1994

FCC MAIL ROOM

July 26, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M. Street-Room 222
Washington, DC 20554

Re: CC Docket No. 92-77, Phase II

Dear Mr. Caton:

I operate 16 moderately priced hotels in the southeastern United States. We employ some 1500 employees, each of which are dependant on our making their hotel successful.

One essential area of service is that of proper telephone access. Our industry has worked diligently to provide the necessary services to our guests. However, this effort does not come without expense.


Today's consumer will not allow many telephone services to be billed directly. The competitive components of the marketplace demand that we include most telephone benefits in their room rate.

To be able to afford to provide these services and stay current with technology, we must be able to recuperate these expenses in some way. Today we have the opportunity to negotiate with our long distance carriers so as to provide methods by which to absorb some of these costs. Once again the free market prevails in making the outcome at each level of sale appropriate and reasonable.

I would appreciate your taking my opposition into consideration when the issue of "Billed Party Preference" is decided upon.

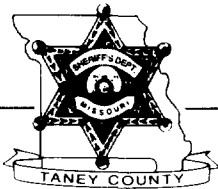
Thank you for your time.

Sincerely,


Gaines P. Sturdivant, CHA
President

GPS/sk

NO. of copies rec'd 0
BY: ABODL



County of **TANEY** State of Missouri

SHERIFF'S DEPARTMENT

Box 1005

FORSYTH, MO 65653

JUL 28 3 06 PM '94

THERON JENKINS, SHERIFF

MEMBER

Missouri Sheriff's Association

PHONE: 417-546-2191

FAX: 417-546-3348

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

BOOKED FILE COPY ORIGINAL

RECEIVED

AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

Theron Jenkins
Sheriff of Taney Co.

No. of Copies rec'd 0
List ABCDE

Rensselaer County



DOCKET FILE COPY ORIGINAL

Office of the Sheriff

DANIEL V. KEATING
SHERIFF

JOHN R. DWYER
UNDERSHERIFF

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

28 July 1994

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

RECEIVED

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20541

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at Inmate Correctional Facilities.

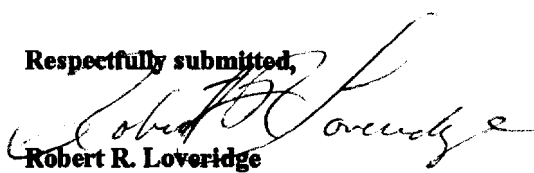
We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunication network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is designed specifically for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate correctional facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our responsibility to employ important security and administrative measures that we have found to be necessary at our correctional facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions, decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,


Robert R. Loveridge
Colonel, Jail Superintendent
Rensselaer County Correctional Facility
4000 Main Street
Troy, New York 12180
(518) 270-5448

No. of Copies rec'd 0
List ABCDE

4000 MAIN STREET, TROY, NEW YORK 12180 • PHONE: (518) 270-5252



Platte County Sheriff's Department

Platte County Courthouse • Columbus, Nebraska 68601

Phone: (402) 564-3229 • FAX: (402) 564-1662

Jon J. Zavadil,
Sheriff

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

Jon Zavadil

No. of Copies rec'd 0
List ABCDE

DO NOT DESTROY ORIGINAL

RECEIVED

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Marilyn Henderson
326 Weathercock
San Antonio, TX 78239

DO NOT WRITE COPY ORIGINAL

RECEIVED

July 20, 1994

AUG 12 1994

The Honorable Reed Hundt
Federal Communications Commission
1919 M Street NW
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Representative Hundt:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Marilyn Henderson

No. of Copies rec'd
List ABCDE

0